

**REMARKS**

This is a complete and timely response to the Office Action mailed on August 25, 2005 by the United States Patent and Trademark Office. In the Office Action, the Examiner rejected all pending claims 1-20. Applicant respectfully requests reconsideration in light of the instant amendment and following remarks. In particular, claims 1 and 10 have been amended, and claims 3-5 and 11-12 have been canceled without disclaimer and without prejudice to the filing of one or more continuation applications based on the subject matter of these claims. 15 Claims remain pending (2 independent, 13 dependent). No new matter has been added.

**I. Claim Rejections – 35 U.S.C. § 102**

Claims 1, 2, 6, 7, 10, 13, 14, 15, 17, and 18 stand rejected under 35 U.S.C. 102(b) as being anticipated by a U.S. Pat. No. 5,708,655 (the "Toth reference"). This rejection is respectfully traversed. The Toth reference does not teach, suggest, or otherwise disclose each and every element of the claims as amended.

The Toth reference is directed to a wireless communication system with a dynamically-assigned address providing a temporary address to route data (see Abstract). The Examiner cites the serving packet switch node SPSN 38, a gateway packet switch node (GPSN), and an IP address server (IAS); however, none of these elements function as a security controller as recited in the claims as amended. The Toth reference also does not disclose a system wherein the first security controller selects one of the first network elements for coupling to the second network as variously recited in the claims.

While the Applicants maintain that the claims, as originally presented, are not anticipated by the Toth reference, and that Applicants' arguments in the previous Response have not been rebutted by the Examiner, in the interest of compact prosecution independent claim 1 has been amended to include the elements of original claims 3-5, and independent claim 10 has been amended to include the elements of original claims 11 and 12. These elements relate to a system "wherein said first and second security controllers pre-negotiate an internet protocol security for the selected ones of the pluralities of first and second network elements, and wherein the first and second security controllers establish security associations for said plurality of first and second network elements"

(quoting amended claim 1). As the Examiner notes in the Office Action, these elements are not disclosed by the Toth reference.

Furthermore, the independent claims have been amended to specify that the security associations are subsequently transmitted (downloaded) to the first and second network elements. The Toth reference also does not disclose these elements.

As the dependent claims variously depend from independent claims 1 and 10, the rejected dependent claims are not anticipated for at least the reasons set forth above. Accordingly, Applicant respectfully requests that the Section 102 rejection be withdrawn with respect to the pending claims.

## **II. Claim Rejections – 35 U.S.C. § 103**

Claims 3, 4, 5, 11, 12, and 16 stand rejected to under 35 U.S.C. 103(a) as being unpatentable over Toth et al. in view of WIPO International Application No. WO00/02406 (the “Ekbert reference”). Claims 8, 9, 19, and 20 stand rejected as being unpatentable over the Toth reference in view of U.S. Patent No. 6,553,219 (the “Vilander reference”) further in view of UMTS Release 1999 (the “UMTS reference”). These rejection is respectfully traversed.

As detailed above, no combination of the cited references would include each and every element of the claims as amended. Furthermore, there is no motivation to combine the references as suggested by the Examiner.

More particularly, neither the Toth reference, the Vilander reference, nor the UMTS reference disclose a system “wherein said first and second security controllers pre-negotiate an internet protocol security for the selected ones of the pluralities of first and second network elements, and wherein the first and second security controllers establish security associations for said plurality of first and second network elements.” Furthermore, none of the cited references, taken alone or in combination, disclose a system wherein the security associations are subsequently transmitted to the first and second network elements.

Accordingly, Applicants respectfully request that the Section 103 rejections be withdrawn with respect to the claims as amended.

## II. Conclusion

In view of the above, Applicants respectfully submit that the application, as amended, is now in condition for allowance, and such allowance is therefore earnestly requested. Should the Examiner have any questions or wish to further discuss this application, Applicants request that the Examiner contact the Applicants' attorneys at the below-listed number.


If for some reason Applicants have not requested a sufficient extension and/or have not paid a sufficient fee for this response and/or for the extension necessary to prevent abandonment on this application, please consider this as a request for an extension for the required time period and/or authorization to charge Deposit Account No. 50-2091 for any fee which may be due.

Respectfully submitted,

INGRASSIA FISHER & LORENZ

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By:

  
Daniel R. Pote  
Reg. No. 43,011  
(480) 385-5060